

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Curtis Earl Strickland
and Joan T. Strickland
Debtor(s)

Case No.: 19-32013-KLP
Chapter 13

RESPONSE TO OBJECTION TO PLAN

Curtis Earl Strickland and Joan T. Strickland Debtors, responds to the objection of Vanderbilt Mortgage and Finance, Inc., as follows:

1. The hearing on confirmation is set for 06/19/2019, 09:10 AM, Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia.
2. An Objection to Confirmation of the Chapter 13 Plan Vanderbilt Mortgage and Finance, Inc. on 6/17/2019.
3. Objections to confirmation are governed by Rule 3015(f) which provides:

Objection to Confirmation; Determination of Good Faith in the Absence of an Objection. An objection to confirmation of a plan shall be filed and served on the debtor, the trustee, and any other entity designated by the court, and shall be transmitted to the United States trustee, at least seven days before the date set for the hearing on confirmation, unless the court orders otherwise. An objection to confirmation is governed by Rule 9014. If no objection is timely filed, the court may determine that the plan has been proposed in good faith and not by any means forbidden by law without receiving evidence on such issues.

4. To be timely filed an objection to the plan would have to have been filed not later than 6/12/2019.
5. The Debtors assert they are proceeding in good faith.
6. Because the Objection was not timely filed the court should over-rule the objection and confirm the plan.

WHEREFORE the Debtors' Plan should be confirmed as proposed.

Dated: June 17, 2019

Curtis Earl Strickland
and Joan T. Strickland

/s/ Nathaniel Webb

By _____
Nathaniel Webb

Nathaniel Webb
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Certificate of Mailing

I hereby certify that the foregoing Pleading was forwarded electronically and/or mailed via U.S. Mail on June 17, 2019, to:

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/s/ Nathaniel Webb

Nathaniel Webb